

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE
MAINE

NATIONAL ORGANIZATION FOR
MARRIAGE AND AMERICAN
PRINCIPLES IN ACTION,

Plaintiffs,

v.

WALTER F. McKEE, in his official
capacity as member of the Commission
on Government Ethics and Election
Practices, et al.,

Defendants.

CIVIL NO. 09-538-B-H

**MAINE CITIZENS FOR CLEAN ELECTIONS' MOTION FOR LEAVE TO FILE
AMICUS CURIAE BRIEF**

NOW COMES the Maine Citizens for Clean Elections and moves this Court,
pursuant to 7(a) of the Local Rules for the United States District Court for the District of
Maine, for leave to participate as *amicus curiae* in the above captioned matter. Support
for this motion is set forth below.

1. The Plaintiffs filed the instant action against the Defendants on October 21,
2009.
2. In 1996, Maine voters passed the Maine Clean Election Act (MCEA) which
established a voluntary program of full public financing of political campaigns
for candidates running for Governor, State Senator, and State Representative.
21-A M.R.S.A. §§ 1121-1128.
3. Maine Citizens for Clean Elections, ("MCCE"), is a nonpartisan coalition of
groups and individuals that formed after the passage of the MCEA to advocate

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4. for, increase public support for, defend, and improve the MCEA and related campaign finance laws.
5. MCCE is the only organization in Maine devoted entirely to monitoring and strengthening the MCEA and related campaign finance laws, and its members possess expertise in this field that would be useful in assisting the Court.
6. While the Plaintiff did not bring the instant action against the MCCE, the MCCE has an interest in how this Court's decision impacts the MCEA and related campaign finance laws.
7. MCCE seeks an opportunity to respond to Plaintiff's complaint through an *amicus curiae* brief to be filed at the appropriate time.
8. MCCE agrees to be subject to the existing confidentiality order governing the parties in this matter.
9. Counsel for the Defendants, the Maine Attorney General, consents to the instant request to appear as *amicus curiae*.
10. Counsel for the Plaintiffs, Josiah Neeley, consents to the instant request to appear as *amicus curiae*.

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WHEREFORE, the Maine Citizens for Clean Elections respectfully requests the Court grant its request to appear as amicus curiae in the above captioned matter.

DATED: March 11, 2010

Respectfully submitted,

/s/ Benjamin K. Grant

Benjamin K. Grant

Bar #4328

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Elections

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